

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

ARNULFO RODRIGUEZ,
Movant,

v.

UNITED STATES OF AMERICA,
Respondent.

No. 4:18-CV-876-O
(4:16-CR-029-O (4))

GOVERNMENT’S MOTION FOR EXTENSION OF TIME

The government respectfully requests a 30-day extension—to February 13, 2019—to file its response to Rodriguez’s motion under 28 U.S.C. § 2255.

The extension is requested due to the undersigned’s workload and so that the government can provide a thorough brief. Counsel is working diligently on this matter as well as the rest of his caseload. Since December 3, I have filed the government’s response in *Burkett v. United States*, 4:18-CV-805-O, *Langston v. United States*, 4:18-CV-921-A, *Jaramillo v. United States*, 5:18-CV-250-C, and *White v. United States*, 3:18-CV-2561-N-B. In addition, I have devoted a substantial amount of time preparing to present oral argument in the United States Court of Appeals for the Fifth Circuit in *United States v. Cabello*, 18-10001.

This extension is not sought for purposes of delay, and it will allow the government to provide the best response possible. The government requests that its deadline to file a response be extended to February 13, 2019.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

s/ Jonathan Bradshaw
Jonathan Bradshaw
Assistant United States Attorney
Colorado Bar No. 43838
1100 Commerce Street, Third Floor
Dallas, Texas 75242
Telephone: (214) 659-8600
jonathan.bradshaw@usdoj.gov

CERTIFICATE OF CONFERENCE

I have not spoken to Rodriguez regarding this motion because he is incarcerated.

s/ Jonathan Bradshaw
Jonathan Bradshaw
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on January 11, 2018, I filed this motion with the clerk of court for the U.S. District Court, Northern District of Texas. A copy was sent to Arnulfo Rodriguez, Register No. 53753-177, BOP Giles W. Dalby CI, 805 N. Avenue F, Post, Texas 79356, by United States mail.

s/ Jonathan Bradshaw
Jonathan Bradshaw
Assistant United States Attorney